



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

February 27, 2007

Ms. Janice Bell
National Environmental Policy Act Document Manager
U.S. Department of Energy
National Energy Technology Laboratory
626 Cochran's Mill Road
P.O. Box 10940
Pittsburgh, PA 15236-0940

RE: Supplemental Draft Environmental Impact Statement (DEIS) for the Gilberton Coal-to-Clean Fuels and Power Project. CEQ # 20050511

Dear Ms. Bell;

In accordance with the National Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the above referenced project. The SDEIS was prepared specifically to correct information regarding carbon dioxide (CO₂) emissions from the proposed Gilberton plant; to provide information on the feasibility of carbon sequestration of the CO₂ emissions from the plant; and to present additional information regarding the CO₂-related cumulative impacts associated with potential future deployment of the proposed technology.

In response, the SDEIS has provided an analysis of the CO₂ emissions for the proposed Gilberton plant. According to the analysis, the facility will contribute an additional global emission of 2,282,000 tons per year of CO₂. Further, over the entire fuel cycle, the fuel generated by the facility will produce 80% more greenhouse gas emissions than from production and delivery of conventional petroleum-derived fuels. Finally, the SDEIS reports that CO₂ mitigation measures like carbon sequestration are considered not viable for an operational scale facility at this time.

As global climate change may be attributable to increases in CO₂ emissions and other greenhouse gasses, we question how the project aligns with the objectives of the Federal government's recently developed Global Climate Change Policy (see <http://www.whitehouse.gov/ceq/global-change.html>). This policy has three basic objectives:

- Slowing the growth of emissions
- Strengthening science, technology and institutions
- Enhancing international cooperation

We recommend that the FEIS provide a discussion of how the Gilberton project aligns with these

goals. We also recommend that adaptive management provisions be considered to assess CO₂ mitigation measures into the project's design as they become practicable.

Based on the concern raised above EPA has rated this SDEIS as Environmental Concerns and Insufficient information (EC-2) as described in our guidelines that can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>. Thank you for the opportunity to comment on this SDEIS. If you have any question please contact Kevin Magerr at (215) 814-5724.

Sincerely,

A handwritten signature in black ink, appearing to read "Wm Arguto", written over a light blue rectangular background.

William Arguto
NEPA Team Leader